

EXHIBIT 168

DC Huddle Guide

All Distribution Centers that warehouse controlled substances and/or listed chemicals must conduct suspicious order monitoring (SOM). This Huddle is to be conducted with all employees at the DC who interact with controlled substances and/or listed chemicals to remind them of the Company's existing policy to detect and block suspicious orders of controlled substances and listed chemicals.

Distribution Center Instructions:

1. All Distribution Center employees who interact with controlled substances and/or listed chemicals are required to participate in this huddle.
2. Management who manage such employees should also participate. LP staff and the LP Manager should also be included in the training.
3. The Leader conducting the training should familiarize him or herself with the material prior to conducting the huddle. Contact Betsy Ferguson or Stacey Bernstein at corporate if you have any questions prior to conducting the training.

Introduction

This huddle is intended to remind you of the Distribution Center's responsibility to comply with suspicious order monitoring for all orders of controlled substances and listed chemicals. And it is the Company's policy to comply with all applicable federal and state laws.

I. Suspicious Order Monitoring

All Distribution Centers that warehouse controlled substances and/or listed chemicals must conduct suspicious order monitoring for orders of controlled substances and listed chemicals. Distribution Centers are uniquely positioned to perform due diligence in order to help support the security and prevent the abuse or diversion of controlled substances and/or listed chemicals we deliver to our customers—the CVS stores. All employees at the distribution center that interact with controlled substances and/or listed chemicals can help ensure that controlled substances and listed chemicals delivered to our stores are ultimately dispensed/sold for legitimate purposes.

Employees should be trained on the following general information:

1. DEA regulations require that all distributors must design a system to monitor, detect and report any suspicious orders. We call this the suspicious order monitoring (SOM) process.
2. For Control Drug orders this includes “orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency” (21CFR 1301.74(b)).
3. For List I chemicals, such as Pseudoephedrine and Ephedrine (PSE, EPH), a distributor must report transactions involving an “extraordinary quantity,” an “uncommon method of payment or delivery” or any other circumstance that would indicate that the product will be used in violation of the Controlled Substances Act. (21 CFR 1310.05(a)(1)).
4. EVERYONE on the team plays a key role in fulfilling these obligations.
5. CVS has two ways that irregular orders are identified:
 - a. An algorithm runs on every order and identifies the orders that are irregular so that analysts can do separate research to determine if the order is suspicious.
 - b. Warehouse associates should review orders and if they find an order that they believe is irregular, tell their supervisor immediately.
6. If an order is deemed irregular, either by someone in the distribution center or by the algorithm, a special team reviews these “orders of interest” and researches them to determine if they are suspicious.
7. Once the team has completed reviewing the order of interest, the SOM Manager will notify the Distribution Center that the order is legitimate and can be shipped to the store or the Distribution Center will be notified that the order appears suspicious. All suspicious orders will be blocked and will not be shipped to the store. All suspicious orders will be immediately reported to DEA and the board of pharmacy (where required) by the SOM Manager.

Warehouse associates. Specifically for the warehouse associates that interact with controlled substances and listed chemicals, please train them on the following.

1. Your obligation is to immediately notify your supervisor of any orders that you believe are:

- (1) Too large to be a typical order for a store;
- (2) Deviate from normal ordering patterns of stores;
- (3) Frequent orders that are going to the same store; and
- (4) Any other circumstance that makes an order appear irregular.

2. You should think about the “drug family”—all the drugs that contain the same controlled substance (codeine, for instance) and drugs in the drug class—and not just each separate strength and/or brand name of a particular drug in determining if you believe an order should be held.

3. You must report your concerns to your manager/supervisor and do not let the order leave the distribution center until your manager/supervisor informs you that it can be shipped. Further research into the order will be done by the specialized group to determine if the order is suspicious by calling the store and doing other research to review the legitimacy of the order.

4. Remember that just because there is an algorithm that reviews orders does not mean that you must not be alert to orders that you deem to be irregular.

5. Heightened diligenceshould be used for orders that include drugs of concern, which include but are not limited to:

- buprenorphine (Buprenex, Subutex, Suboxone)
- Hydrocodone with acetaminophen
- codeine with acetaminophen
- amphetamines (Adderall, Dexedrine)
- methylphenidate (Concerta and Ritalin)
- barbiturates (butalbital)
- benzodiazepines (Ativan, Halicon, Klonopin, Valium, Xanax)
- Ambien and sonata

II. Why the SOM process is important

- Federal law requires the Distribution Center to operate a system to identify suspicious orders and it is the Company’s policy to comply with all applicable federal and state laws.
- In addition to complying with SOM obligations, all registrants—including the Distribution Center—have a general obligation to detect and avoid the abuse or

diversion of controlled substances. Remember that prescription drug abuse is the nation's fastest-growing drug problem:

- For example, from 1997-2007, use of prescription opioids increased 402% (per-milligram, per-person);
- Oxycodone street value is roughly \$1 per milligram; and
- In 2010, 26% of first-time drug abusers began by abusing prescription drugs because it is perceived as "safer" than street drugs.

III. How to handle a regulatory visit

The DEA and other government regulators are authorized to enter Distribution Centers and review and request certain types of information relating to controlled substances and listed chemicals. In general, they may review and request documents regarding the ordering of controlled substances and listed chemicals, as well as our SOM process.

If DEA or another government authority visits a Distribution Center it is important that you immediately notify the Distribution Center Director (or their designee) and the Loss Prevention Manager. The DC Director or designee must immediately notify Legal and/or Compliance. The Manager should also ask for identification from every visitor and write down each person's name or obtain copies of their business cards.

It is important to cooperate with government investigators as they conduct an inspection or audit by assisting them in locating documents or accessing the controlled substance drug cage.

The government investigators might seek to question or interview employees about Company practices and procedures while they are reviewing documents, but they cannot require employees to participate in an interview or otherwise answer their questions during the visit. It is the employees' choice to respond to their questions. No interview should be conducted without a Manager present. And you may request that a Company attorney be present for any interview with a government investigator. We request that you promptly advise your supervisor if you or one of your colleagues is asked by a government investigator for an interview so that the Company's counsel can arrange the interview. At all times, it is the employees' sole choice whether to participate in a government interview.

A Manager must accompany government investigators on any visit in the Distribution Center for safety reasons. If you see any governmental investigator unaccompanied in the facility you should immediately notify your supervisor.

We have identified possible questions the DEA might ask employees:

- What does SOM stand for and what are your responsibilities around SOM?

- How do you evaluate whether to fill an order for controlled substances from a store? Is there a protocol?

Conclusion

Each DC team member plays a key role in SOM. This huddle defines the responsibilities of each member of the team.

Compliance with SOM will help ensure the pharmacy team has the appropriate medications in stock at the right time for our customers and is not ordering too many, or not following their corresponding responsibility.